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FOR PUBLIC INSPECTION

February 6, 2001

By Hand Delivery

Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: CC Docket No. 01-9

Dear Ms. Salas:

Enclosed are the following: (1) the original and two copies of the Opposition of Network Access Solutions marked "Confidential-Not for Public Inspection" on each page; and (2) one copy of the Opposition of Network Access Solutions marked "For Public Inspection" on each page. The two versions of the Opposition are identical except that certain confidential information has been deleted from the Public version.

Sincerely,

Rodney L. Joyce

Enclosures

FOR PUBLIC INSPECTION

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of:	)	
	)	
Application by Verizon New England, Inc.,	)	
Bell Atlantic Communications, Inc. (d/b/a	)	
Verizon Long Distance), NYNEX Long	)	CC Docket No. 01-9
Distance Company (d/b/a Verizon Enterprise	)	
Solutions), and Verizon Global Networks,	)	
for Authorization to Provide In-Region,	)	
InterLATA Services in Massachusetts	)	

OPPOSITION OF
NETWORK ACCESS SOLUTIONS

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Dated: February 6, 2001

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SUMMARY

Even if the Commission were to accept the methodology that Verizon has used to calculate its performance in serving CLECs during the September-November period that is the subject of Verizon's Supplement, FCC precedent requires that Verizon's application be denied since the company's performance on several key performance measures is far below the standard that the Commission has found minimally acceptable. For example, Network Access Solutions ("NAS") shows in this Opposition that between September 1 and November 30, 2000, according to Verizon's own data, Verizon installed within the six business day provisioning interval just 83.6 percent of the DSL loops that is was supposed to install within that interval rather than 95 percent as required. The NAS Opposition demonstrates that Verizon likewise fails to install anywhere close to 95 percent of DSL loops by the FOC date that Verizon itself set, as it is required to do. Verizon's own data also shows that DSL loops experience far more troubles within the first 30 days of installation than the loops that it installs for its local exchange service customers.

While Verizon's performance requires denial of the application even if its calculations are accepted, the NAS Opposition also shows that Verizon has made several assumptions in making those calculations that have the effect of making the company's performance appear better than it really is. When performance is recalculated to correct for those unfair assumptions, Verizon's actual performance is even worse than it has admitted.

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Solutions), and Verizon Global Networks,	)	
for Authorization to Provide In-Region,	)	
InterLATA Services in Massachusetts	)	

OPPOSITION OF NETWORK ACCESS SOLUTIONS

Network Access Solutions ("NAS") opposes grant of Verizon's application to provide interLATA service in Massachusetts for the reasons set forth in NAS's opposition to the initial application[1] and for the additional reasons discussed below.[2] In an effort to escape an adverse ruling by the Commission, Verizon withdrew its initial application just before the Commission was to vote on it. The company submitted a Supplemental Filing ("Supplement") several weeks later. The Supplement seeks to persuade the FCC to let Verizon provide interLATA service in Massachusetts based on changed circumstances since the initial application was filed. In particular, Verizon notes that the New York Public Service Commission recently adopted new procedures to calculate Verizon's performance in installing and maintaining DSL loops, and the company seeks to show in the Supplement that its performance was satisfactory between September 1 and November 30, 2000 when calculated under these new procedures. In fact,

[1] NAS Opp. in CC Dkt. 00-176 (Oct. 16, 2000).

[2] NAS requests that the Commission make NAS's opposition to Verizon's initial application part of the record of this proceeding.

however, Verizon's data confirms that its performance on several of the revised metrics was grossly deficient throughout this period as we show below. [3] Verizon's failure to comply with these metrics requires that the Commission deny this application under the agency's own precedent.[4]

ARGUMENT

I. Verizon's Supplemental Filing Confirms that Its Performance Under PR-3-10 Is Far Below the Required Level

Verizon's own data shows that the percentage of DSL loops that Verizon installed between September and November within six business days after the loop was ordered (Metric PR-3-10) is far lower than it should be even when its compliance rate is calculated under the new procedures adopted by the New York Commission as Verizon proposes. While Verizon is required to install 95 percent of DSL loops within six business days under the new procedures, the company admits in the Supplement that it installed just 83.6 percent of DSL loops within that

[3] The New York Commission's order made two types of revisions to the PR-3-10, PR-4, and PR-6-01 Metrics that are discussed in this Opposition effective January 1, 2001. *See Order Adopting Revisions to Inter-Carrier Service Quality Guidelines Proceeding* at 2 and Att. A at 7-8 (N.Y.P.S.C Case 97-C-0139, Dec. 15, 2000). First, the order permits Verizon to claim a higher performance rate under each of these Metrics than was previously possible. It does this by eliminating several types of loop orders in calculating performance. In return, however, the order also adopted a more stringent performance standard for each of these Metrics. Whereas Verizon previously was required to comply with these three Metrics no less frequently in providing DSL loops to CLECs than it did in providing loops to its own retail DSL customers, the company now must comply with PR-3-10 and PR-4 at least 95 percent of the time when installing DSL loops for CLECs regardless of its performance in installing loops for its own retail DSL customers, and it must comply with PR-6-01 no less frequently in installing DSL loops for CLECs than it does in installing voice loops for its retail telephone exchange service customers. While the New York order was not in effect in either New York or Massachusetts during the September-November period covered by the Supplement, Verizon nonetheless asks the Commission to assume that the order *was* in effect in Massachusetts throughout that period for purposes of calculating Verizon's Massachusetts performance under the three Metrics. *See* Verizon's Supp. Filing at 7-8, 18-19, 22-23. If the Commission grants Verizon's request to calculate performance under the methodology adopted in that order, fairness requires that it then compare Verizon's performance under each of these Metrics to the new performance standard adopted in the December order for these Metrics.

[4] *See, e.g., Bell Atl. New York Section 271 App.*, 15 FCC Rcd 3953 at ¶ 37 (1999) ("a BOC's promises of future performance [on a given performance standard] . . . have no probative value in demonstrating compliance with" the requirements of Section 271 of the Act"); *Ameritech Michigan Section 271 Order*, 12 FCC Rcd. 20543 at 20573074 (1997) (same).

interval during the September-November period.[5] Of equal if not greater significance, the percentage of loop installations within the six-day interval also is much smaller in the more recent months of October and November (80% and 82%, respectively) than in September (89%).

For DSL loop orders by NAS, Verizon's performance under Metric PR-3-10 during the September-November period **deleted**. Rather than install 95 percent of all NAS-ordered loops within six days, Verizon instead installed just **xx** percent of NAS's orders within that interval.[6] Worse yet, Verizon's performance to NAS was most deficient in the two most recent months, as the following chart shows:

Metric PR-3-10			
Performance Requirement	Verizon's Actual Performance in Installing NAS Loops Within 6 Days of the Date They Are Ordered (Calculated in the Manner that Verizon Proposes)		
	September	October	November
95% Installed within six business days of the loop order	**XX**	**XX**	**XX**

While Verizon's performance under PR-3-10 plainly is deficient when calculated in the manner that Verizon proposes, the Commission should revise the way that PR-3-10 is calculated in at least one respect for purposes of this proceeding. Verizon proposes to calculate its performance by excluding all orders where the CLEC's customer was not home when the

[5] *See* Verizon's Supp. Filing. at 18-20 and Gertner/Bamberger Supp. Aff. at 6-10 (proposing that , in accordance with the New York Commission's December 15, 2000 order discussed in note 3, *supra*, the FCC exclude each of the following order types in calculating Verizon's performance under PR-3-10: (i) all orders for which CLECs requested installation after the six-day interval, (ii) all orders for which Verizon informed the CLEC (typically on the scheduled installation day) that a suitable loop was not available), (iii) all orders for which the CLEC requested manual qualification, and (iv) all orders which Verizon did not install because the CLEC's customer was not home at the time Verizon came to make the installation. In addition, Verizon proposes to exclude all orders that were either submitted or scheduled to be installed during Verizon's August strike. Gertner/Bamberger Supp. Aff.. at 8.

[6] Gertner/Bamberger Supp. Aff., Att. C at 28-29, 56-57, 80 (containing raw data from which Verizon's performance to NAS under PR-3-10 is calculated under the methodology that Verizon proposes).

Verizon technician came to make the installation.[7] But permitting this exclusion would be patently unfair since CLEC customers often are not home at the time the installer arrives for a reason of Verizon's own making. Specifically, while Verizon often gives its own retail service customers a two-hour window for service calls (including loop installation calls), the company always gives CLEC customers an eight-hour appointment window on the installation day in direct violation of the non-discrimination requirement in Section 251(c)(3) of the Act. Not surprisingly, many CLEC customers cannot commit to stay at home for an entire day and therefore sometimes find when they return from a brief trip away from home that the Verizon technician already has come and gone. The result, of course, is a delay in the installation of the loop. And although Verizon's decision to give CLEC customers a longer installation window than its retail customers often is the cause of Verizon's inability to obtain access to the CLEC customer's premises on the loop installation day, the company nonetheless proposes to exclude all of those delayed installations in calculating the percentage of time it installs DSL loops for CLEC customers within the required six-day interval. NAS pointed out this act of discriminatory conduct by Verizon in comments on the company's initial application.[8] Verizon offered no response whatsoever in its Reply.

Verizon's own reports on PR-4-03 help confirm that Verizon's conduct is to blame for a large percentage of the situations where the Verizon installer cannot access a CLEC customer's premises. PR-4-03 tracks these "no-access" cases. In almost every month, the percentage of cases where Verizon is unable to access the premises of a CLEC customer is vastly higher than the percentage of cases where the company cannot access the premises of a Verizon

[7] *See* n. 5, *supra*.

[8] NAS Opp. in CC Dkt. 00-176, *supra*, at 3-4. *See also* Covad Opp. in CC Dkt. No. 00-176 at 20-22 (Oct. 16, 2000).

retail customer. In November 2000, for example, Verizon claims that 14.3 percent of its housecalls to CLEC customers as a group were in vain because the customer was not home, while only 1.21 percent of housecalls to Verizon retail customers led to "no access" situations.[9] These statistics constitute strong evidence that there is a serious problem with Verizon's procedures for handling "no access" situations since there is no reason to believe that Verizon's retail customers are 12 times more likely than the CLECs' retail customers to stay at home. NAS submits that Verizon's discriminatory eight-hour window is a significant reason for the disproportionate number of "no access" situations among CLEC customers. Yet Verizon not only refuses to change is policies, it also asks unfairly that it be allowed to ignore all "no access" situations in calculating its performance in installing DSL loops on-time.

NAS cannot revise Verizon's own calculation of performance under PR-3-10 for all CLECs as a group by including missed appointments caused by "no access" situations in the calculation since Verizon filed data on "no access" situations under seal as Attachment R to the Supplemental Lacouture/Ruesterholz Declaration. But since the Commission has access to that data, it can quite easily revise Verizon's own calculation of performance under PR-3-10 to CLECs as a group by including missed appointments caused by "no access" situations in that calculation.

However, NAS can revise Verizon's calculation of performance under PR-3-10 to NAS alone by including missed appointments caused by "no access" situations in the calculation since Verizon provided data to NAS showing the number of "no access" situations Verizon experienced between September and November in installing loops for NAS.[10] If just half of

[9] *See* Lacouture/Ruesterholz Aff., Att. C at 5.

[10] Lacouture/Ruesterholz Aff., Att. R at 50, 63, and 117.

these situations were included in calculating Verizon's performance to NAS under PR-3-10, Verizon would be deemed to have installed less than **xx** percent of NAS loops between September and November within the six-day interval prescribed by PR-3-10 rather than **xx** percent as Verizon had calculated.

Verizon has overstated its performance to NAS under PR-3-10 in one other way too. In its PR-3-10 performance calculations, Verizon deemed a loop order to be received by Verizon on the day after the day the order is submitted if the submission date was after 5 p.m.[11] But it is unfair to treat NAS orders in this manner since any NAS order received by Verizon after 5 p.m. was received late because Verizon's GUI web interface was not working properly that day, rather than because NAS did not try to submit it prior to 5 p.m. NAS and most other CLECs use the GUI interface to order DSL loops. NAS opened numerous trouble tickets during the September-November period to report that the interface was either not working or was operating too slowly. If Verizon's data were corrected so that NAS loop orders received by Verizon after 5 p.m. are considered received on the day they are submitted rather than the next day, Verizon would be deemed to have installed just **xx** percent of NAS orders within the prescribed six-day interval during the September-November period, with October and November performance, once again, being even worse:[12]

[11] Gertner/Bamberger Supp. Aff. at 7-8.

[12] *See id.*, Att. C at 28-29, 56-57, and 80.

Metric PR-3-10			
Performance Requirement	Verizon's Actual Performance in Installing NAS Loops Within 6 Days of the Date They Are Ordered (Correcting Verizon's Calculations by Including Orders It Received from NAS After 5 p.m.)		
	September	October	November
95% Installed within six business days of the loop order	**XX**	**XX**	**XX**

Moreover, Verizon would be deemed to have installed only about **xx** percent of NAS's loop orders within the six day interval between September and November (rather than the required 95 percent) if its performance to NAS were further revised to attribute half of the no-access situations to Verizon as NAS has proposed on pages 3-6 above.

To summarize: Verizon's performance under PR-3-10 is seriously deficient under that company's own calculations (just 83.6 percent of installations within six days to CLECs as a group and **xx** percent of installations within six business days to NAS, rather than the required 95 percent), and it is even more deficient if the Verizon calculations are revised in the specific ways suggested above. But even if the Commission decided not to make these revisions, it sill should deny the application since Verizon's failure to comply with the six-day installation deadline more than 16 percent of the time for CLECs as a group (and more than **xx** percent of the time for NAS), confirms the horrible state of DSL loop provisioning that exists in Massachusetts and, indeed, throughout Verizon's service territory.

II. The Verizon Supplement Also Shows that the Company's Performance Under PR-4 Is Deficient

Verizon's performance in installing DSL loops during the September-November period also is deficient if judged by the percentage of loops installed by the date Verizon promised (Metrics PR-4-14 through PR-4-18) (the "PR-4 Metrics"). First, although Verizon

calculates that it installed DSL loops in Massachusetts by the scheduled date about 90 percent of the time during the September-November period (still lower than the 95 percent on-time installation rate that is required when Verizon's performance is calculated in the manner that Verizon proposes),[13] the Commission has ruled that, in deciding whether an ILEC's performance under this standard is acceptable, it may consider the ILEC's experience in meeting the standard in states where the ILEC handles a larger volume of orders.[14] In this case, the Commission should consider Verizon's performance in New York since Verizon installs a far larger volume of DSL loops in New York than in Massachusetts. Unfortunately, Verizon's performance under the PR-4 Metrics in New York has been terrible. For example, PAP reports filed with the New York Public Service Commission show that between October 1 and December 31 of 2000 Verizon installed fewer than 82 percent of DSL loops for New York CLECs by the installation deadline that Verizon itself had set.[15] Relevant excerpts from Verizon's New York performance reports are attached. Verizon calculated its performance on the PR-4 Metrics in New York in those reports in the same way that it proposes to calculate performance here.[16]

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[13] *See* n. 3, *supra*. Verizon excluded each of the following order types in calculating the percentage of loop orders that it installs by the scheduled completion date: (i) installations that are late because the customer was not home to let the installer in, (ii) installations that are late because a suitable loop was not available, or (iii) installations of orders either made or scheduled for installation during the August strike.

[14] *See SBC Commun. (Kansas and Oklahoma) Section 271 Order* at ¶ 180 (FCC 01-29, rel. Jan. 22, 2001) ("We . . . look to SWBT's performance [in meeting the same standard] in Texas (where SWBT has been handling commercial volumes to a greater degree and for a longer period of time) as evidence relevant to . . .[a given] checklist item because volumes in Kansas and Oklahoma are low").

[15] Verizon's performance on PR-4 is unsatisfactory in other states too. In Pennsylcania, for example, the company failed to install 24 percent of loops requiring a dispatch on time in October and was late in installing 19.2 percent of such loops in November. *See* Verizon PA 271 Filing Checklist Declar., Att. 209, filed Jan. 8, 2001 with the Pennsylvania Public Utility Commission.

[16] Verizon also installed just 67.5 percent of New York DSL loops by the installation deadline in September, but it is not possible to calculate the company's September performance on the PR-4 Metrics in exactly the same way that Verizon proposes here. As indicated in n. 15, *supra,* Verizon proposes to exclude loop orders that were ordered or scheduled to be installed during the August strike in determining performance under the PR-4 Metrics. Although Verizon has told the New York Commission that more than 67.5 percent of New York DSL loop orders would be deemed to have been installed in September by the scheduled date if orders made or scheduled for installation during the strike are included in the calculations, it has not indicated what percentage of orders affecting calculation

(continued)

Verizon's clearly deficient performance on the PR-4 Metrics to CLECs as a group in New York is matched by the company's deficient performance on these Metrics to NAS in Massachusetts given Verizon's admission in its Supplement that it installed just **xx** percent of NAS's Massachusetts loop orders during the September-November period by the promised installation date.[17] This is far below the 95 percent on-time installation rate that Verizon is supposed to meet.[18] In addition, Verizon's performance to NAS in Massachusetts in the two most recent months of October and November was worse than in September, as the following chart shows:

Metrics PR-4-14 through PR-4-18 (combined)			
Performance Requirement	Verizon's Actual Performance in Installing NAS Loops by the Date It Had Set (As Calculated by Verizon)		
	September	October	November
95% installed by the installation date set by Verizon	**XX**	**XX**	**XX**

Moreover, Verizon would be deemed to have been installed an even smaller percentage of NAS loops by the scheduled date if the methodology it used to make its calculations is corrected in two ways. First, since Verizon unfairly excludes all "no access" situations in calculating its performance under the PR-4 Metrics as explained on pages 3-6 above, the Commission should recalculate Verizon's performance under these Metrics by

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of September performance were ordered or installed during the strike. *See* Verizon petition requesting waiver for non-compliance with PAP performance standards in September 2000 (Case No. 99-C-0949, filed Nov. 30, 2000) By contrast, Verizon has told the New York Commission that its October and November performance under the PR-4 Metrics was *not* affected by the August strike. *See* Verizon petition requesting waiver for non-compliance with PAP performance standards in Oct. 2000 (Case No. 99-C-0949, filed Dec. 15, 2000 and amended Dec. 19, 2000); Letter from W.D. Smith (Verizon) to Hon. J. H. Deixler submitting PAP compliance report for Nov. 2000 (Cases 97-C-0271 and 99-C-0949, Dec. 26, 2000).

[17] *See* Lacouture/Ruesterholz Supp. Aff., Att. R at 4.

[18] *See* n. 3, *supra.*

including at least half of the "no-access"situations. Doing so would lower Verizon's performance to NAS under these Metrics in the three-month period at issue here from **xx** percent to **xx** percent.

In addition, in calculating performance under the PR-4 Metrics Verizon has unfairly ignored all NAS loop orders that were either submitted or scheduled to be installed during the August strike. This is unfair because even if it were appropriate to exclude some of these strike-related orders it is patently unfair for Verizon to ignore the specific strike-related orders that it failed to install until long after the strike ended. In NAS's case, Verizon installed sometime between **deleted** – a large percentage of all NAS loop orders that either were made or scheduled for installation during the strike.[19] If the delay associated with this single portion of strike-related orders were attributed to Verizon rather than to NAS as Verizon proposes, the company's performance on the PR-4 Metrics to NAS would be **xx** percent (rather than **xx** percent) even if no correction for the "no access" situations is made, and the company's performance would be less than **xx** percent if "no access" situations are included in calculating Verizon's performance under these Metrics as NAS has proposed.

Verizon's consistent failure to install roughly 20 percent of all New York CLEC DSL loops by the installation deadline Verizon sets and its **deleted** performance to NAS in Massachusetts requires that the present application be denied under the Commission's own precedent. While the agency has held that failure to install up to 10 percent of DSL loops by the installation deadline may be marginally acceptable if the percentage of late installations has been

[19] Lacouture/Ruesterholz Supp. Aff., Att. R at 103, 151-52.

declining in recent months,[20] it has never granted an application to provide interLATA service by an ILEC who, like Verizon, misses the installation deadline about twice as often as the marginally acceptable rate and whose poor performance has not improved in the most recent months.

III. The Supplement Shows that Verizon's Performance Under PR-6-01 Likewise Is Lacking

Once Verizon finally installs the DSL loops that NAS orders, Verizon's own calculations under PR-6-01 also show that those loops do not work correctly an unacceptably high percentage of the time. Indeed, Verizon admits in the Supplement that during October and November a problem occurred within 30 days after its installation of a DSL loop for NAS **xxxx deleted** than is permitted by PR-6-01. More specifically, a problem occurred with **xxxx** percent of NAS loops within 30 days of installation during this period while a problem occurred with just 3.1 percent of the loops Verizon installed for its retail customers.[21] Even when loop troubles that Verizon claims (without support) NAS should have caught before accepting the loop are excluded from the calculations, a problem still occurred with **xx** percent of NAS loops within 30 days of installation as compared to fewer than 3.1 percent of Verizon's retail loops.[22] Under either calculation, Verizon's performance under PR-6-01 to NAS is patently unacceptable.

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[20] *SBC Commun. (Kansas and Okla. Order, supra* at ¶ 188.

[21] *See* Supp. Lacouture/Ruesterholz Aff., Att. AA at 4 (calculating percentage of NAS loops experiencing trouble within 30 days of installation); Supp. Gertner/Bamberger Declar. at 4 (showing percentage of Verizon dialtone loops experiencing trouble within 30 days of installation). *See also* n. 3, supra (explaining that under the procedures adopted recently by the New York Commission, Verizon's performance to CLECs under PR-6-01 is compared with Verizon's performance vis-à-vis its installation of new loops for its retail local exchange service customers).

[22] *See* Supp. Lacouture/Ruesterholz Aff., Att. Y at 13 and 24 (listing each trouble on NAS loops within 30 days of installation along with Verizon's speculation about whether each listed trouble was Verizon's fault); Supp. Lacouture/Ruesterholz Aff., Att. AA at 44 (calculating the percentage of NAS loops experiencing trouble within 30 days of installation whose trouble Verizon admits was its fault).

CONCLUSION

The Commission should deny Verizon's application to provide interLATA service in Massachusetts for the reasons discussed in NAS's opposition to Verizon's initial application and the additional reasons discussed above.

Respectfully submitted,

NETWORK ACCESS SOLUTIONS CORPORATION

By: _____

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Dated: February 6, 2001

Verizon NY 271 Backslide Report

October 2000

U N E

Pre-Ordering

Metric	Description	VZ	CLEC	Diff.	Perf. Score	Wgt.	Wgtd. Score
PO-1-01-6020	**Customer Service Record**	2.73	2.92	0.19	0	15	0.000
PO-1-02-6020	**Due Date Availability**	0.16	3.32	3.16	0	5	0.000
PO-1-03-6020	**Address Validation**	6.71	5.47	-1.24	0	5	0.000
PO-1-04-6020	**Product and Service Availability**	0.19	3.56	3.36	0	5	0.000
PO-1-05-6020	**Telephone Number Availability and Reservation**	7.99	9.31	1.32	0	5	0.000
PO-1-06-6020	**Facility Availability (Loop Qualification)**	3.85	3.88	0.03	0	5	0.000
PO-2-02-6020	**OSS Interface Availability - Prime**		99.99		0	20	0.000
PO-3-02-3000	% Answered within 30 Seconds - Ordering		88.25		0	10	0.000
PO-3-04-3000	% Answered within 30 Seconds - Repair		95.05		0	10	0.000

OR Ordering

Metric	Description	CLEC	Observations	Perf. Score	Wgt.	Wgtd. Score
OR-1-02-3320	**% On Time LSRC - Flow Through - POTS - 2hrs**	99.14	257,652	0	40	0.000
OR-1-04-3100	**% OT LSRC<10 Lines (Elec.-No Flow Through)-POTS**	97.99	59,794	0	10	0.000
OR-1-04-3200	% OT LSRC<10 Lines (Elec.-No Flow Through)-Specials	89.80	1,589	-2	5	-0.015
OR-1-04-3300	% OT LSRC<10 Lines (Elec.-No Flow Through)-Complex	97.79	2,080	0	0	0.000
OR-1-06-3320	**% On Time LSRC >=10 Lines (Electronic) - POTS**	97.20	786	0	10	0.000
OR-1-06-3200	% On Time LSRC >=10 Lines (Electronic) - Specials	90.80	87	-1	5	-0.007
OR-1-06-3300	% On Time LSRC >=10 Lines (Electronic) - Complex	NA		0	0	0.000
OR-2-02-3320	**% On Time LSR Reject - Flow Through - POTS**	99.52	46,391	0	30	0.000
OR-2-04-3320	**% OT LSR Rej.<10 lines (Elec.-No Flow Through)-POTS**	99.00	39,105	0	30	0.000
OR-2-04-3200	% OT LSR Rej.<10 lines (Elec.-No Flow Through)-Specials	96.95	755	0	5	0.000
OR-2-04-3300	% OT LSR Rej.<10 lines (Elec.-No Flow Through)-Complex	96.17	836	0	0	0.000
OR-2-06-3320	**% On Time LSR Reject >= 10 Lines (Electronic) - POTS**	97.49	319	0	10	0.000
OR-2-06-3200	% On Time LSR Reject >= 10 Lines (Electronic) - Specials	95.55	45	0	5	0.000
OR-2-06-3300	% On Time LSR Reject >= 10 Lines (Electronic) - Complex	NA		0	0	0.000
OR-4-09-3000	**% SOP to Bill Completion Sent w/in 3 Business Days**	99.57	218,071	0	30	0.000
OR-5-03-3112	% Flow Through - Achieved - POTS & Specials	90.81	283,872	-1	20	-0.030
OR-6-03-3000	% Accuracy LSRC	95.96	867	0	10	0.000

PR Provisioning

Metric	Description	VZ	CLEC	VZ	CLEC	VZ Standard Deviation	Sampling Error	Stat. Score	Perf. Score	Wgt.	Wgtd. Score
PR-3-08-3142	% Completed w/in 5 Days (1-5 lines-No Dispatch)-UNE-P/Ot	95.85	97.57	246,922	32,742		0.12	14.66	0	10	0.000
PR-3-09-3142	% Completed w/in 5 Days (1-5 lines-Dispatch)-UNE-P/Other	49.64	68.77	30,867	30,867		0.40	47.53	0	5	0.000
PR-4-01-3200	**% Missed Appointment - VZ - Total - Specials**	8.90	0.00	4,876	1		28.48	0.31	0	10	0.000
PR-4-01-3510	**% Missed Appointment - VZ - Total - EEL**		UD						0	0	0.000
PR-4-01-3530	% Missed Appointment - VZ - Total - IOF	8.90	7.56	4,876	119		[illegible]	[illegible]	0	10	0.000
PR-4-02-3100	Average Delay Days - Total - POTS	8.02	9.04	16,812	824	11.67	[illegible]	[illegible]	-2	10	-0.030
PR-4-02-3200	Average Delay Days - Total - Specials	21.96	NA	97		15.51	#DIV/0	NA	0	10	0.000
PR-4-02-3300	Average Delay Days - Total - Complex	15.90	12.38	167	1,190	18.60	[illegible]	[illegible]	0	10	0.000
PR-4-04-3140	% Missed Appointment - VZ - Dispatch - Platform	16.70	8.98	96,152	7,699		[illegible]	[illegible]	0	10	0.000
PR-4-04-3113	**% Missed Appointment - VZ - Dispatch - New Loop**	16.70	8.88	96,152	608		1.52	[illegible]	0	10	0.000
PR-4-04-3300	% Missed Appointment - VZ - Dispatch - Complex	10.69	20.98	1,487	5,673		0.90	-11.43	-2	10	-0.030
PR-4-05-3140	**% Missed Appointment- VZ - No Dispatch - Platform**	0.16	0.03	486,730	245,822		0.01	13.15	0	20	0.000
PR-4-05-3300	% Missed Appointment- VZ - No Dispatch - Complex	0.64	NA	1,256			#DIV/0	NA	0	0	0.000
PR-5-01-3100	% Missed Appointment - Facilities - POTS	0.83	0.13	582,882	254,829		0.02	32.49	0	10	0.000
PR-5-01-3200	% Missed Appointment - Facilities - Specials	2.40	0.00	4,876	1		15.31	0.16	0	10	0.000
PR-5-02-3100	% Orders Held for Facilities > 15 days - POTS	0.20	0.01	582,882	254,829		0.01	17.91	0	5	0.000
PR-5-02-3200	% Orders Held for Facilities > 15 days - Specials	0.06	0.00	4,710	1		2.45	0.02	0	5	0.000
PR-6-01-3121	% Installation Troubles within 30 days - POTS Other	5.14	1.67	562,911	233,816		0.05	63.85	0	15	0.000
PR-6-01-3200	% Installation Troubles within 30 days - Specials	3.51	22.50	5,646	120		[illegible]	[illegible]	-2	15	[illegible]
PR-6-02-3520	**% Installation Troubles within 7 days - Hot Cut**		0.47		11,322				0	15	0.000
PR-9-01-3520	**% On Time Performance - Hot Cut**		97.37		4,644				0	20	0.000

MR Maintenance & Repair

Metric	Description	VZ	CLEC	Diff.	Perf. Score	Wgt.	Wgtd. Score
MR-1-01-2000	Average Response Time - Create Trouble	8.23	5.48	-2.75	0	5	0.000
MR-1-03-2000	Average Response Time - Modify Trouble	8.23	5.39	-2.84	0	5	0.000
MR-1-04-2000	Average Response Time - Request Cancellation of Trouble	9.43	5.66	-3.77	0	5	0.000
MR-1-06-2000	Average Response Time - Test Trouble (POTS only)	58.65	52.13	-6.52	0	5	0.000

Metric	Description	VZ	CLEC	VZ	CLEC	VZ Standard Deviation	Sampling Error	Stat. Score	Perf. Score	Wgt.	Wgtd. Score
MR-2-01-3200	Network Trouble Report Rate - Specials	0.87	2.34	384,493	4,016		0.15	-10.04	-2	10	-0.030
MR-2-02-3112	Network Trouble Report Rate - Loop (POTS)	1.37	1.16	9,806,718	1,606,090		0.01	20.88	0	10	0.000
MR-3-01-3112	% Missed Repair Appointments - Loop	11.36	9.68	134,177	18,658		0.25	6.78	0	20	0.000
MR-3-02-3100	% Missed Repair Appointments - Central Office	6.86	5.21	21,380	2,631		0.52	3.16	0	5	0.000
MR-4-01-3200	**Mean Time to Repair - Specials**	6.32	8.43	3,329	94	9.04	0.95	-2.24	-2	20	-0.059
MR-4-02-3112	**Mean Time to Repair - Loop Trouble**	28.62	26.35	134,177	18,658	36.25	0.28	[illegible]	0	15	0.000
MR-4-03-3100	**Mean Time to Repair - CO Trouble**	11.73	11.93	21,380	2,631	20.05	[illegible]	[illegible]	0	5	[illegible]
MR-4-08-3100	**% Out of Service > 24 Hours - POTS**	28.75	27.29	123,667	17,121		[illegible]	[illegible]	0	20	[illegible]
MR-4-08-3200	**% Out of Service > 24 Hours - Specials**	2.86	3.28	3,287	61		[illegible]	[illegible]	[illegible]	10	[illegible]
MR-5-01-3100	**% Repeat Reports w/in 30 days - POTS**	20.53	23.21	155,557	21,289		[illegible]	[illegible]	[illegible]	15	[illegible]
MR-5-01-3200	**% Repeat Reports w/in 30 days - Specials**	23.55	20.21	3,329	94		[illegible]	[illegible]	0	15	[illegible]

BI Billing

Metric	Description	CLEC	Perf. Score	Wgt.	Wgtd. Score
BI-1-02-2030	% DUF in 4 Business Days	99.79	0	10	[illegible]
	Totals		[illegible]	675	[illegible]

"NA" - no activity "UD" - under development

Under the provisions of the Plan, the -1 performance scores are subject to adjustment based on the next two month's performance.

Verizon New York State

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October 2000 **Sheet G**

INTERCONNECTION (TRUNKS)

OR	Ordering	CLEC	Obs.	Perf. Score	Wgt.	Wgtd. Score
OR-1-12-5020	% On Time Firm Order Confirmations	96.67	30	0	15	0.000
OR-1-13-5020	% On Time Design Layout Record	99.46	186	0	10	0.000
OR-2-12-5000	% On TimeTrunk ASR Reject	95.00	20	0	10	0.000

PR	Provisioning	VZ	CLEC	Observations VZ	Observations CLEC	VZ Standard Deviation	Sampling Error	Stat. Score	Perf. Score	Wgt.	Wgtd. Score
PR-4-01-5000	**% Missed Appointment - VZ - Total**	9.38	7.20	16,966	25,007		0.29	7.52	0	20	0.000
PR-4-02-5000	Average Delay Days - Total	24.23	14.44	1,591	1,800	25.13	0.86	11.32	0	10	0.000
PR-4-07-3540	**% On Time Performance - LNP only**		100.00		5,355				0	20	0.000
PR-5-01-5000	% Missed Appointment - Facilities	0.00	0.00	16,966	10,684		0.00		0	10	0.000
PR-5-02-5000	% Orders Held for Facilities > 15 Days	0.00	0.00	16,966	10,684		0.00		0	10	0.000
PR-6-01-5000	% Installation Troubles w/in 30 Days	0.01	0.02	16,966	25,007		0.01	-0.39	0	15	0.000
MR	**Maintenance & Repair**										
MR-4-01-5000	**Mean Time to Repair - Total**	1.77	1.97	23	50	1.57	0.40	-0.51	0	20	0.000
MR-5-01-5000	% Repeat Reports w/in 30 Days	8.70	8.00	23	50		7.10	0.10	0	10	0.000
NP	**Network Performance**										
NP-1-03-5000	**# of Final Trunk Groups Blocked 2 Months**		0.00		263				0	10	0.000
NP-1-04-5000	**# of Final Trunk Groups Blocked 3 Months**		0.00		263				0	20	0.000
								Totals	0	180	0.000

Collocation

NP	Network Performance	CLEC	Obs.	Perf. Score	Wgt.	Wgtd. Score
NP-2-01-2000	% OT Response to Request for Physical Collocation	100	294	0	10	0.000
NP-2-02-2000	% OT Response to Request for Virtual Collocation	100	10	0	10	0.000
NP-2-05-2000	**% On Time - Physical Location**	93	102	-1	20	-0.333
NP-2-06-2000	**% On Time - Virtual Location**	NA		0	0	0.000
NP-2-07-2000	**Average Delay Days - Physical**	11	7	-1	20	-0.333
NP-2-08-2000	**Average Delay Days - Virtual**	NA		0	0	0.000
				Totals	60	-0.667

xDSL Performance Report (Critical Measure 12)

		VZ	CLEC	VZ	CLEC	Sampling Error	Stat. Score
PO-8-01	**Manual Loop Qualification**		UD				
PO-8-02	**Engineering Record Request**		UD				
PR-4-14	**% Completed on Time**		74.50		2,847		
PR-4-15	**% Completed on Time**		76.40		2,847		
PR-4-16	**% Completed on Time**		73.56		1,131		
PR-4-17	**% Completed on Time**		82.19		219		
PR-4-18	**% Completed on Time**		NA				
PR-6-01-3300	**% Installation Troubles - xDSL Loops**	5.14	8.12	562,911	4,370	0.34	8.90

"NA" - no activity "UD" - under development

Under the provisions of the Plan, the -1 performance scores are subject to adjustment based on the next two month's performance.

Verizon NY 271 Backslide Report

November 2000

UNE

	Pre-Ordering	VZ	CLEC	Diff.	Perf. Score	Wgt.	Wgtd. Score
PO-1-01-6020	**Customer Service Record**	2.72	2.48	-0.25	0	15	0.000
PO-1-02-6020	**Due Date Availability**	0.14	2.95	2.81	0	5	0.000
PO-1-03-6020	**Address Validation**	5.60	5.74	0.15	0	5	0.000
PO-1-04-6020	**Product and Service Availability**	0.17	3.17	3.00	0	5	0.000
PO-1-05-6020	**Telephone Number Availability and Reservation**	6.81	7.75	0.94	0	5	0.000
PO-1-06-6020	**Facility Availability (Loop Qualification)**	13.99	3.87	-10.12	0	5	0.000
PO-2-02-6020	**OSS Interface Availability - Prime**		99.92		0	20	0.000
PO-3-02-3000	% Answered within 30 Seconds - Ordering		95.11		0	10	0.000
PO-3-04-3000	% Answered within 30 Seconds - Repair		91.71		0	10	0.000

OR	Ordering			Observations					
OR-1-02-3320	**% On Time LSRC - Flow Through - POTS - 2hrs**		99.16	254,128			0	40	0.000
OR-1-04-3100	**% OT LSRC<10 Lines (Elec.-No Flow Through)-POTS**		97.03	47,331			0	10	0.000
OR-1-04-3200	% OT LSRC<10 Lines (Elec.-No Flow Through)-Specials		86.19	1,615			-2	5	-0.015
OR-1-04-3300	% OT LSRC<10 Lines (Elec.-No Flow Through)-Complex		98.13	1,989			0	0	0.000
OR-1-06-3320	**% On Time LSRC >=10 Lines (Electronic) - POTS**		96.43	702			0	10	0.000
OR-1-06-3200	% On Time LSRC >=10 Lines (Electronic) - Specials		95.12	82			0	5	0.000
OR-1-06-3300	% On Time LSRC >=10 Lines (Electronic) - Complex		100.00	1			0	0	0.000
OR-2-02-3320	**% On Time LSR Reject - Flow Through - POTS**		99.29	46,303			0	30	0.000
OR-2-04-3320	**% OT LSR Rej.<10 lines (Elec.-No Flow Through)-POTS**		98.73	30,743			0	30	0.000
OR-2-04-3200	% OT LSR Rej.<10 lines (Elec.-No Flow Through)-Specials		91.65	671			-1	5	-0.007
OR-2-04-3300	% OT LSR Rej.<10 lines (Elec.-No Flow Through)-Complex		97.10	760			0	0	0.000
OR-2-06-3320	**% On Time LSR Reject >= 10 Lines (Electronic) - POTS**		97.71	263			0	10	0.000
OR-2-06-3200	% On Time LSR Reject >= 10 Lines (Electronic) - Specials		90.48	63			-1	5	-0.007
OR-2-06-3300	% On Time LSR Reject >= 10 Lines (Electronic) - Complex		NA				0	0	0.000
OR-4-09-3000	**% SOP to Bill Completion Sent w/in 3 Business Days**		98.71	215,236			0	30	0.000
OR-5-03-3112	% Flow Through - Achieved - POTS & Specials		92.38	275,286			-1	20	-0.030
OR-6-03-3000	% Accuracy LSRC		95.24	819			0	10	0.000

PR	Provisioning	VZ	CLEC	VZ	CLEC	VZ Standard Deviation	Sampling Error	Stat. Score			
PR-3-08-3142	% Completed w/in 5 Days (1-5 lines-No Dispatch)-UNE-P/Ot	96.12	99.04	228,824	29,852		0.12	24.57	0	10	0.000
PR-3-09-3142	% Completed w/in 5 Days (1-5 lines-Dispatch)-UNE-P/Other	54.11	88.14	24,960	388		2.55	13.35	0	5	0.000
PR-4-01-3200	**% Missed Appointment - VZ - Total - Specials**	14.20	33.53	3,887	170		2.74	-7.07	-2	10	-0.030
PR-4-01-3510	**% Missed Appointment - VZ - Total - EEL**		UD						0	0	0.000
PR-4-01-3530	% Missed Appointment - VZ - Total - IOF	14.20	17.86	3,887	336		1.98	-1.84	-2	10	-0.030
PR-4-02-3100	Average Delay Days - Total - POTS	6.16	8.22	11,933	708	9.43	0.36	-5.65	-2	10	-0.030
PR-4-02-3200	Average Delay Days - Total - Specials	22.40	23.63	73	57	51.63	9.13	-0.13	0	10	0.000
PR-4-02-3300	Average Delay Days - Total - Complex	9.44	10.02	198	875	15.84	1.25	-0.47	0	10	0.000
PR-4-04-3140	% Missed Appointment - VZ - Dispatch - Platform	14.26	8.85	80,085	6,556		0.45	12.04	0	10	0.000
PR-4-04-3113	**% Missed Appointment - VZ - Dispatch - New Loop**	14.26	11.81	80,085	491		1.58	1.55	0	10	0.000
PR-4-04-3300	% Missed Appointment - VZ - Dispatch - Complex	9.40	25.14	1,309	3,480		0.95	-16.63	-2	10	-0.030
PR-4-05-3140	**% Missed Appointment- VZ - No Dispatch - Platform**	0.12	0.03	432,352	231,549		0.01	10.09	0	20	0.000
PR-4-05-3300	% Missed Appointment- VZ - No Dispatch - Complex	0.43	NA	17,561				NA	0	0	0.000
PR-5-01-3100	% Missed Appointment - Facilities - POTS	0.74	0.12	512,437	238,656		0.02	29.19	0	10	0.000
PR-5-01-3200	% Missed Appointment - Facilities - Specials	3.60	0.00	3,887	170		1.46	2.47	0	10	0.000
PR-5-02-3100	% Orders Held for Facilities > 15 days - POTS	0.17	0.02	512,437	238,656		0.01	14.69	0	5	0.000
PR-5-02-3200	% Orders Held for Facilities > 15 days - Specials	0.00	0.00	2,313	170		0.00	0.00	0	5	0.000
PR-6-01-3121	% Installation Troubles within 30 days - POTS Other	4.86	1.53	491,468	230,066		0.05	61.33	0	15	0.000
PR-6-01-3200	% Installation Troubles within 30 days - Specials	4.02	3.56	4,753	506		0.92	0.50	0	15	0.000
PR-6-02-3520	**% Installation Troubles within 7 days - Hot Cut**		0.29		10,224				0	15	0.000
PR-9-01-3520	**% On Time Performance - Hot Cut**		98.04		4,292				0	20	0.000

MR	Maintenance & Repair			Diff.			
MR-1-01-2000	Average Response Time - Create Trouble	7.91	5.28	-2.63	0	5	0.000
MR-1-03-2000	Average Response Time - Modify Trouble	7.91	5.17	-2.74	0	5	0.000
MR-1-04-2000	Average Response Time - Request Cancellation of Trouble	9.11	6.18	-2.93	0	5	0.000
MR-1-06-2000	Average Response Time - Test Trouble (POTS only)	58.72	53.80	-4.92	0	5	0.000

								Stat. Score			
MR-2-01-3200	Network Trouble Report Rate - Specials	0.79	2.27	385,673	4,236		0.14	-10.82	-2	10	-0.030
MR-2-02-3112	Network Trouble Report Rate - Loop (POTS)	1.29	1.12	9,742,771	1,689,647		0.01	18.13	0	10	0.000
MR-3-01-3112	% Missed Repair Appointments - Loop	9.62	7.96	125,343	18,861		0.23	7.21	0	20	0.000
MR-3-02-3100	% Missed Repair Appointments - Central Office	5.93	3.24	17,347	2,221		0.53	5.05	0	5	0.000
MR-4-01-3200	**Mean Time to Repair - Specials**	6.52	7.00	3,039	96	7.85	0.81	-0.59	0	20	0.000
MR-4-02-3112	**Mean Time to Repair - Loop Trouble**	24.63	23.55	125,343	18,861	27.70	0.22	5.01	0	15	0.000
MR-4-03-3100	**Mean Time to Repair - CO Trouble**	10.98	10.10	17,347	2,221	18.52	0.42	2.12	0	5	0.000
MR-4-08-3100	**% Out of Service > 24 Hours - POTS**	25.82	24.18	116,317	17,057		0.36	4.57	0	20	0.000
MR-4-08-3200	% Out of Service > 24 Hours - Specials	3.13	4.55	3,005	66		2.17	-0.66	0	10	0.000
MR-5-01-3100	% Repeat Reports w/in 30 days - POTS	19.31	21.75	142,690	21,082		0.29	-8.38	-2	15	-0.044
MR-5-01-3200	% Repeat Reports w/in 30 days - Specials	23.26	20.83	3,039	96		4.38	0.55	0	15	0.000

BI	Billing					
BI-1-02-2030	% DUF in 4 Business Days	98.95				
	"NA" - no activity "UD" - under development		Totals	0	10	0.000
				-17	675	-0.252

Under the provisions of the Plan, the -1 performance scores are subject to adjustment based on the next two month's performance.

Verizon New York State
271 Backslide Report

November 2000 **Sheet G**

INTERCONNECTION (TRUNKS)

OR	Ordering	CLEC	Obs.	Perf. Score	Wgt.	Wgtd. Score
OR-1-12-5020	% On Time Firm Order Confirmations	94.74	19	0	0	0.000
OR-1-13-5020	% On Time Design Layout Record	99.32	147	0	10	0.000
OR-2-12-5000	% On TimeTrunk ASR Reject	100.00	14	0	10	0.000

PR	Provisioning	VZ	CLEC	Observations VZ	Observations CLEC	VZ Standard Deviation	Sampling Error	Stat. Score	Perf. Score	Wgt.	Wgtd. Score
PR-4-01-5000	**% Missed Appointment - VZ - Total**	6.11	5.64	12,267	22,162		0.27	1.74	0	20	0.000
PR-4-02-5000	Average Delay Days - Total	33.68	27.07	749	1,251	27.39	1.27	5.22	0	10	0.000
PR-4-07-3540	**% On Time Performance - LNP only**		99.94		5,221				0	20	0.000
PR-5-01-5000	% Missed Appointment - Facilities	0.78	0.00	12,267	7,768		0.13	6.11	0	10	0.000
PR-5-02-5000	% Orders Held for Facilities > 15 Days	0.00	0.00	12,267	7,768		0.00	0.00	0	10	0.000
PR-6-01-5000	% Installation Troubles w/in 30 Days	0.01	0.00	12,267	22,162		0.01	0.36	0	15	0.000
MR	**Maintenance & Repair**										
MR-4-01-5000	**Mean Time to Repair - Total**	4.07	2.65	29	49	7.22	1.69	0.84	0	20	0.000
MR-5-01-5000	% Repeat Reports w/in 30 Days	20.69	10.20	29	49		9.49	1.10	0	10	0.000
NP	**Network Performance**										
NP-1-03-5000	**# of Final Trunk Groups Blocked 2 Months**		0.00		263				0	10	0.000
NP-1-04-5000	**# of Final Trunk Groups Blocked 3 Months**		0.00		263				0	20	0.000
								Totals	0	165	0.000

Collocation

NP	Network Performance	CLEC	Obs.	Perf. Score	Wgt.	Wgtd. Score
NP-2-01-2000	% OT Response to Request for Physical Collocation	100	263	0	10	0.000
NP-2-02-2000	% OT Response to Request for Virtual Collocation	NA		0	0	0.000
NP-2-05-2000	**% On Time - Physical Location**	91	141	-1	20	-0.400
NP-2-06-2000	**% On Time - Virtual Location**	NA		0	0	0.000
NP-2-07-2000	**Average Delay Days - Physical**	11	12	-1	20	-0.400
NP-2-08-2000	**Average Delay Days - Virtual**	NA		0	0	0.000
				Totals	-2	50	-0.800

xDSL Performance Report (Critical Measure 12)

		VZ	CLEC	VZ	CLEC		Sampling Error	Stat. Score
PO-8-01	**Manual Loop Qualification**		UD					
PO-8-02	**Engineering Record Request**		UD					
PR-4-14	**% Completed on Time**		85.89		2,090			
PR-4-15	**% Completed on Time**		88.09		2,090			
PR-4-16	**% Completed on Time**		84.19		911			
PR-4-17	**% Completed on Time**		89.31		262			
PR-4-18	**% Completed on Time**		NA					
PR-6-01-3300	**% Installation Troubles - xDSL Loops**	4.86	9.56	491,468	3,263		0.38	-12.44

"NA" - no activity "UD" - under development

Under the provisions of the Plan, the -1 performance scores are subject to adjustment based on the next two month's performance.

Verizon NY 271 Backslide Report

December 2000

UNE

	Pre-Ordering	VZ	CLEC	Diff.	Perf. Score	Wgt.	Wgtd. Score
PO-1-01-6020	**Customer Service Record**	2.72	2.51	-0.20	0	15	0.000
PO-1-02-6020	**Due Date Availability**	0.13	3.01	2.88	0	5	0.000
PO-1-03-6020	**Address Validation**	5.39	4.85	-0.54	0	5	0.000
PO-1-04-6020	**Product and Service Availability**	0.17	3.51	3.34	0	5	0.000
PO-1-05-6020	**Telephone Number Availability and Reservation**	6.55	7.15	0.60	0	5	0.000
PO-1-06-6020	**Facility Availability (Loop Qualification)**	10.91	3.67	-7.25	0	5	0.000
PO-2-02-6020	**OSS Interface Availability - Prime**		99.96		0	20	0.000
PO-3-02-3000	% Answered within 30 Seconds - Ordering		89.61		0	10	0.000
PO-3-04-3000	% Answered within 30 Seconds - Repair		96.71		0	10	0.000

OR	Ordering			Observations							
OR-1-02-3320	**% On Time LSRC - Flow Through - POTS - 2hrs**		98.43	245,480				0	40	0.000
OR-1-04-3100	**% OT LSRC<10 Lines (Elec.-No Flow Through)-POTS**		96.62	45,081				0	10	0.000
OR-1-04-3200	% OT LSRC<10 Lines (Elec.-No Flow Through)-Specials		82.18	1,543				-2	5	-0.015
OR-1-04-3300	% OT LSRC<10 Lines (Elec.-No Flow Through)-Complex		98.23	1,469				0	0	0.000
OR-1-06-3320	**% On Time LSRC >=10 Lines (Electronic) - POTS**		96.99	632				0	10	0.000
OR-1-06-3200	% On Time LSRC >=10 Lines (Electronic) - Specials		93.06	72				-1	5	-0.007
OR-1-06-3300	% On Time LSRC >=10 Lines (Electronic) - Complex		100.00	2				0	0	0.000
OR-2-02-3320	**% On Time LSR Reject - Flow Through - POTS**		99.09	45,478				0	30	0.000
OR-2-04-3320	**% OT LSR Rej.<10 lines (Elec.-No Flow Through)-POTS**		97.54	28,758				0	30	0.000
OR-2-04-3200	% OT LSR Rej.<10 lines (Elec.-No Flow Through)-Specials		93.51	462				-1	5	-0.007
OR-2-04-3300	% OT LSR Rej.<10 lines (Elec.-No Flow Through)-Complex		98.87	531				0	0	0.000
OR-2-06-3320	**% On Time LSR Reject >= 10 Lines (Electronic) - POTS**		99.10	221				0	10	0.000
OR-2-06-3200	% On Time LSR Reject >= 10 Lines (Electronic) - Specials		100.00	24				0	5	0.000
OR-2-06-3300	% On Time LSR Reject >= 10 Lines (Electronic) - Complex		0.00	1				0	0	0.000
OR-4-09-3000	**% SOP to Bill Completion Sent w/in 3 Business Days**		99.87	197,164				0	30	0.000
OR-5-03-3112	% Flow Through - Achieved - POTS & Specials		91.68	273,195				-1	20	-0.029
OR-6-03-3000	% Accuracy LSRC		95.94	763				0	10	0.000

PR	Provisioning	VZ	CLEC	VZ	CLEC	VZ Standard Deviation	Sampling Error	Stat. Score			
PR-3-08-3142	% Completed w/in 5 Days (1-5 lines-No Dispatch)-UNE-P/Ot	94.83	98.76	245,357	34,116		0.13	30.72	0	10	0.000
PR-3-09-3142	% Completed w/in 5 Days (1-5 lines-Dispatch)-UNE-P/Other	50.27	84.64	25,319	397		2.53	13.59	0	5	0.000
PR-4-01-3200	**% Missed Appointment - VZ - Total - Specials**	10.20	24.79	3,676	117		2.84	-5.13	-2	10	-0.029
PR-4-01-3510	**% Missed Appointment - VZ - Total - EEL**		UD						0	0	0.000
PR-4-01-3530	% Missed Appointment - VZ - Total - IOF	10.20	34.48	3,676	116		2.85	-8.51	-2	10	-0.029
PR-4-02-3100	Average Delay Days - Total - POTS	6.18	7.34	12,522	577	8.86	0.38	-3.07	-2	10	-0.029
PR-4-02-3200	Average Delay Days - Total - Specials	13.66	24.24	38	29	16.67	4.11	-2.57	-2	10	-0.029
PR-4-02-3300	Average Delay Days - Total - Complex	12.54	8.30	167	559	18.04	1.59	2.67	0	10	0.000
PR-4-04-3140	% Missed Appointment - VZ - Dispatch - Platform	15.88	7.87	76,005	6,045		0.49	16.40	0	10	0.000
PR-4-04-3113	**% Missed Appointment - VZ - Dispatch - New Loop**	15.88	14.50	76,005	331		2.01	0.69	0	10	0.000
PR-4-04-3300	% Missed Appointment - VZ - Dispatch - Complex	7.16	21.80	1,243	2,537		0.89	-16.40	-2	10	-0.029
PR-4-05-3140	**% Missed Appointment- VZ - No Dispatch - Platform**	0.10	0.02	443,350	248,067		0.01	10.09	0	20	0.000
PR-4-05-3300	% Missed Appointment- VZ - No Dispatch - Complex	0.42	1.21	18,356	496		0.29	-2.68	-2	10	-0.029
PR-5-01-3100	% Missed Appointment - Facilities - POTS	0.83	0.10	519,355	254,573		0.02	33.26	0	10	0.000
PR-5-01-3200	% Missed Appointment - Facilities - Specials	3.07	0.00	3,676	117		1.62	1.90	0	10	0.000
PR-5-02-3100	% Orders Held for Facilities > 15 days - POTS	0.17	0.01	519,355	254,573		0.01	16.05	0	5	0.000
PR-5-02-3200	% Orders Held for Facilities > 15 days - Specials	0.05	0.00	2,184	117		0.21	0.24	0	5	0.000
PR-6-01-3121	% Installation Troubles within 30 days - POTS Other	4.52	1.45	501,099	243,658		0.05	59.71	0	15	0.000
PR-6-01-3200	% Installation Troubles within 30 days - Specials	2.91	9.87	5,291	233		1.13	-6.18	-2	15	-0.044
PR-6-02-3520	**% Installation Troubles within 7 days - Hot Cut**		0.19		15,561				0	15	0.000
PR-9-01-3520	**% On Time Performance - Hot Cut**		98.97		6,878				0	20	0.000

MR	Maintenance & Repair			Diff.			
MR-1-01-2000	Average Response Time - Create Trouble	6.56	5.29	-1.27	0	5	0.000
MR-1-03-2000	Average Response Time - Modify Trouble	6.56	5.27	-1.29	0	5	0.000
MR-1-04-2000	Average Response Time - Request Cancellation of Trouble	7.79	6.43	-1.36	0	5	0.000
MR-1-06-2000	Average Response Time - Test Trouble (POTS only)	57.91	51.98	-5.93	0	5	0.000

								Stat. Score			
MR-2-01-3200	Network Trouble Report Rate - Specials	0.71	2.97	384,591	3,941		0.13	-16.77	-2	10	-0.029
MR-2-02-3112	Network Trouble Report Rate - Loop (POTS)	1.30	1.13	9,658,574	1,782,394		0.01	18.32	0	10	0.000
MR-3-01-3112	% Missed Repair Appointments - Loop	10.43	9.00	125,293	20,110		0.23	6.16	0	20	0.000
MR-3-02-3100	% Missed Repair Appointments - Central Office	6.25	4.26	18,252	2,603		0.51	3.92	0	5	0.000
MR-4-01-3200	**Mean Time to Repair - Specials**	6.95	9.10	2,737	117	10.89	1.03	-2.09	-2	20	-0.058
MR-4-02-3112	**Mean Time to Repair - Loop Trouble**	25.07	23.63	125,293	20,110	28.45	0.22	6.63	0	15	0.000
MR-4-03-3100	**Mean Time to Repair - CO Trouble**	11.23	11.00	18,252	2,603	17.75	0.37	0.63	0	5	0.000
MR-4-08-3100	**% Out of Service > 24 Hours - POTS**	26.30	23.49	116,725	18,726		0.35	8.11	0	20	0.000
MR-4-08-3200	% Out of Service > 24 Hours - Specials	3.09	8.91	2,717	101		1.75	-3.32	-2	10	-0.029
MR-5-01-3100	**% Repeat Reports w/in 30 days - POTS**	20.10	22.59	143,545	22,713		0.29	-8.70	-2	15	-0.044
MR-5-01-3200	**% Repeat Reports w/in 30 days - Specials**	20.90	19.66	2,737	117		3.84	0.32	0	15	0.000

BI	Billing										
BI-1-02-2030	% DUF in 4 Business Days		99.79						0	10	0.000
	Totals								-27	685	4.0488

"NA" - no activity "UD" - under development

Under the provisions of the Plan, the -1 performance scores are subject to adjustment based on the next two month's performance.

Verizon New York State
271 Backslide Report

December 2000 **Sheet G**

INTERCONNECTION (TRUNKS)

OR	Ordering	CLEC	Obs.	Perf. Score	Wgt.	Wgtd. Score
OR-1-12-5020	% On Time Firm Order Confirmations	89.47	19	-1	15	-0.094
OR-1-13-5020	% On Time Design Layout Record	100.00	167	0	10	0.000
OR-2-12-5000	% On TimeTrunk ASR Reject	91.67	12	0	0	0.000

PR	Provisioning	VZ	CLEC	Observations VZ	Observations CLEC	VZ Standard Deviation	Sampling Error	Stat. Score	Perf. Score	Wgt.	Wgtd. Score
PR-4-01-5000	**% Missed Appointment - VZ - Total**	6.77	5.44	19,863	26,145		0.24	5.62	0	20	0.000
PR-4-02-5000	Average Delay Days - Total	34.35	15.92	1,344	1,422	35.51	1.35	13.64	0	10	0.000
PR-4-07-3540	**% On Time Performance - LNP only**		99.98		8,210				0	20	0.000
PR-5-01-5000	% Missed Appointment - Facilities	0.12	0.00	19,863	8,584		0.04	2.68	0	10	0.000
PR-5-02-5000	% Orders Held for Facilities > 15 Days	0.00	0.00	19,863	8,584		0.00	0.00	0	10	0.000
PR-6-01-5000	% Installation Troubles w/in 30 Days	0.01	0.01	19,863	26,145		0.01	-0.39	0	15	0.000
MR	**Maintenance & Repair**										
MR-4-01-5000	**Mean Time to Repair - Total**	2.28	1.62	19	31	2.14	0.62	1.07	0	20	0.000
MR-5-01-5000	% Repeat Reports w/in 30 Days	0.00	9.68	19	31		0.00	#DIV/0!	0	0	0.000
NP	**Network Performance**										
NP-1-03-5000	**# of Final Trunk Groups Blocked 2 Months**		0.00		266				0	10	0.000
NP-1-04-5000	**# of Final Trunk Groups Blocked 3 Months**		0.00		266				0	20	0.000
								Totals	-1	160	-0.094

Collocation

NP	Network Performance	CLEC	Obs.	Perf. Score	Wgt.	Wgtd. Score
NP-2-01-2000	% OT Response to Request for Physical Collocation	100	183	0	10	0.000
NP-2-02-2000	% OT Response to Request for Virtual Collocation	100	1	0	10	0.000
NP-2-05-2000	**% On Time - Physical Location**	92	77	-1	20	-0.333
NP-2-06-2000	**% On Time - Virtual Location**	NA		0	0	0.000
NP-2-07-2000	**Average Delay Days - Physical**	17	6	-2	20	-0.667
NP-2-08-2000	**Average Delay Days - Virtual**	NA		0	0	0.000
			Totals	-3	60	-1.000

xDSL Performance Report (Critical Measure 12)

		VZ	CLEC	VZ	CLEC		Sampling Error	Stat. Score
PO-8-01	**Manual Loop Qualification**		UD					
PO-8-02	**Engineering Record Request**		UD					
PR-4-14	**% Completed on Time**		83.41		1,429			
PR-4-15	**% Completed on Time**		85.58		1,429			
PR-4-16	**% Completed on Time**		84.67		835			
PR-4-17	**% Completed on Time**		85.65		216			
PR-4-18	**% Completed on Time**		NA					
PR-6-01-3300	**% Installation Troubles - xDSL Loops**	4.52	9.72	501,099	2,480		0.42	-12.44

"NA" - no activity "UD" - under development

Under the provisions of the Plan, the -1 performance scores are subject to adjustment based on the next two month's performance.

FOR PUBLIC INSPECTION

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Opposition of Network Access Solutions Corporation has been sent today, by Federal Express, to each of the following persons for priority delivery tomorrow.

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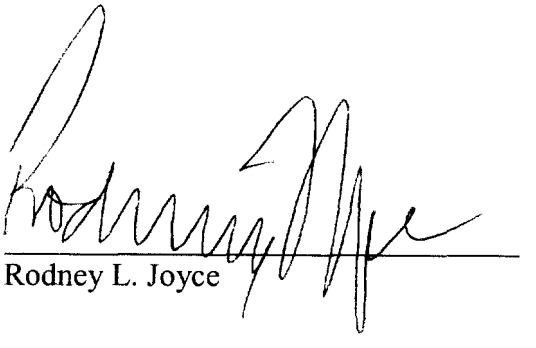

Rodney L. Joyce

Dated: February 6, 2001